

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

SUSAN RATTNER,

Plaintiff,

V.

CHUBB NATIONAL INSURANCE  
COMPANY, *et al.*,

Defendants.

No.: 1:17-cv-00136-LMB-MSN

## **CHUBB NATIONAL'S PROPOSED VOIR DIRE QUESTIONS**

Defendant, Chubb National Insurance Company (“Chubb National”), submits the following suggested *voir dire* questions to supplement the standard *voir dire* questions used by the Court in civil cases.

### Proposed *Voir Dire* Questions

1. Do you know any of the following persons who may be called as witnesses in this case?

- Marc Z. Michael or anyone at AES Corporation
- Captain Rocco Alvaro
- Karen Barker
- Timothy W. Barziza
- Scott Baxter
- Cynthia Bernstiel, Esq. or anyone at Stewart Bernstiel Rebar & Smith
- William T. Blake
- Maureen M. Boak
- Chad Boykin
- Gordon Buist
- Roger Capriles
- Anyone at Cardinal Plumbing
- Douglas J. Carpenter

- Jeff Castner or anyone at Concierge Auctions
- Anyone at Vienna Pond
- Leigh Conner
- James “Randy” Creech or anyone at Belfor Property Restoration
- Amanda Crociata or anyone at Crystal & Co
- Kay Dean
- Anyone at the Rattner Family Trust
- Daniel DeCaro or anyone at DeCaro Auctions International
- Aida Endrias or anyone at Public Storage in McLean, VA
- Andrea B. Feinberg or anyone at Gelman, Rosenberg & Freedman
- Miriam Fernandez or anyone at Gaslight Condominiums
- Christina Fiscella
- Ian Fischer or anyone at Accurate Inventory
- Sam Flagg; Eddie Shapiro; or anyone at Smart Touch, USA
- Galleria Dental Aesthetics
- Cambyse Goodarzi
- Thomas Gordon
- Agnieszka Gryska
- Randy Haddaway
- Roger Hassler
- Daniel Jaeger
- Bradford Jones or anyone at Artifice Forensic Financial Services
- Ava Kaufman, M.D.
- John R. Klagholz
- James Kloke or anyone at Kloke Movers or Turn-Key Moving Solutions
- Paul J. Krump
- John H. Lange Plumbing
- Ilana Bar Levav M.D.
- Michael Levine, Esq.; Jennifer White Esq., Walter J. Andrews, Esq. or anyone at Hunton & Williams LLP
- Long & Foster Real Estate in Washington, DC
- David M. Magnuson
- Kate Malakoff
- Ian Malakoff
- Ron Mangas, Jr. of Sotheby’s
- Duke Mercer or anyone at Euromotorcars
- Kenneth R. McLauchlan
- Richard E. Merck, PE

- Aaron Miller, M.D.
- Michael Minars
- Nicole Muprhy
- Patricia “Paddy” Murphy
- Matthew Murphy
- Sylwia Nowek
- John Nugent & Sons Plumbing
- Howard Potter
- Lisa Oden
- Jon D. Peters M.D.
- Pohanka Lexus Chantilly
- Pritam & Eames
- James Ramroop,
- Steven Rattner
- Dr. Susan Rattner
- R. Kris Coleman or anyone at Red5 Security
- Mark Recht
- Jose Renteria
- Aaron Rude
- Sansar Gallery
- Keith Seekford or anyone at Moore, Clemons & Co
- Carol Snyder
- Sandra Sternstein
- TTR Sotheby’s International in Washington DC
- William C. Turnbull, Jr.
- Maureen White
- John W. Wilkowske
- Wydler Real Estate, including Hans Wydler and Steve Wydler
- Lourdes Vargas
- Roger Vasiliades
- William Goodson
- Wendy Goodson
- Michelle Rush
- Lauri Brown
- Doug Potts
- Susan Potts
- Lucy Mondale
- Gary Malakoff

- Rick Horton
- Sheila Ryan
- Bebe Johnson
- Gail Pean
- Monique Pean
- William Alms, M.D.
- Jeff Carney
- T. Fayson
- G. Austin
- Christa Nottingham
- Josh Baker
- Richard Bottomley
- Leigh Connor
- Ustino Han
- Nolkis Roman or anyone at Havana Vintage
- Marie Lange
- Daniel Fuentes
- Daniel Gallardo
- Ben Sauls
- R. Good, Washington Gas
- Alex Bergmann
- Jerrold Rosenberg
- James P. Bobotek, Esq.
- Joshua B. Katz, Esq.
- Robert Schwartz
- Patrick J. Cronin
- Carl Vincent
- Frank Lattal
- Joseph Mannion
- Jeffrey Major
- Larry Daniel
- Paul Amoruso
- Brian Riffe
- Steven Wolf
- Jeffrey Zwirn

2. Do you know any of the following attorneys or law firms?

- David Anderson from Chubb National Insurance Company

- Cozen O'Connor
- LeClairRyan
- Laurin H. Mills, Esq.
- Jeffrey L. O'Hara, Esq.
- Philip N. Fluhr, Esq.
- Alexander R. Green, Esq.
- Eric D. Freed, Esq.
- Charles J. Jesuit, Jr., Esq.
- Reed Smith LLP
- Mark W. Wasserman, Esq.
- Grayson P. Hanes, Esq.
- Nicholas V. Albu, Esq.
- Justin D. deBettencourt, Esq.
- Dominic I. Rupprecht, Esq.

3. Have you been injured or lost property in a fire?
4. Have you had a close friend or relative who was injured or lost property in a fire?
5. Have you ever been a fire fighter or emergency medical technician?
6. Do you have any close relatives who are or have been fire fighters or emergency medical technicians?
7. Have you or any of your close relatives ever worked in law enforcement?
8. Have you (or anyone close to you) ever worked as an attorney or for an attorney or a law firm?
9. Have you ever owned more than one piece of real estate at the same time?  
  
If so, describe generally the type of real estate (vacation home, rental property, other).
10. How many of you have ever vacationed in Ocean City, Maryland or on the Delaware shore?
11. Do any of you have multiple sclerosis or a similar degenerative muscle disease?

12. Have you ever had a close friend or relative who had multiple sclerosis or similar degenerative muscle disease?

[If so, they need to be questioned privately at the bench about the experience]

13. Have you (or anyone close to you) ever worked for an insurance company or an insurance agent?

14. How many of you currently have either a home owner's or renter's insurance policy?

15. Have you (or anyone close to you) ever filed an insurance claim for fire damage?

If so, do any of you believe the claim processed unfairly?

16. Have you (or anyone close to you) ever had any experience with an insurance company or an insurance agent that would prevent you from being fair in this case?

17. How many of you think that insurance companies try to deny as many claims as possible?

18. How many of you think that insurance companies try to make the claims process difficult to avoid paying claims?

19. Do any of you think that insurance companies look for "technicalities" in their policies to avoid paying claims?

20. Do any of you think that, just because someone pays a premium for an insurance policy, any claim should be covered?

21. Do you think that it is inappropriate for an insurance company to investigate a claim before paying it?

22. Do any of you think it is okay to lie to or mislead claim investigators because insurance companies probably have a lot of money?

23. Do you think it is inappropriate for an insurance company to hire investigators to investigate a claim?

24. Do you think that insurance fraud is a major problem in this country?

25. How many of you think that insurance fraud drives up the price for insurance for everyone?

26. I won't ask you any details, but do any of you know people who have committed insurance fraud?

27. Have you (or anyone close to you) ever been the subject of an investigation by any insurance company?

28. Have you (or anyone close to you) ever had insurance provided by the Chubb Group of insurance companies or ACE?

29. Have you ever submitted a claim to an insurance company or agent that you feel was dealt with unfairly?

30. Do you have any financial interest, or have you had any financial interest in the past, in the Chubb Group of insurance companies?

31. Have you served on a jury before? If so:

When?

Where?

What kind of case?

What was the verdict and who was the verdict for?

Did you have any experience in that jury service that would prevent you from being a fair and impartial juror in this case?

32. Is there anything about the issues in this case that would prevent you from being fair and impartial?

33. Does the schedule for this trial create a hardship for you that might cause you to rush your decision or to be unfair?

34. How many of you are familiar with the television shows called “CSI,” or Crime Scene Investigators?

35. How many of you are familiar with the term “forensic evidence”?

36. If the forensic evidence in this case does not support a witness’s testimony, how many of you would have concerns about the accuracy of the witness’s testimony?

37. Do any of you watch the television show “The Morning Joe”?

Dated: October 2, 2017

Respectfully submitted,

**CHUBB NATIONAL INSURANCE  
COMPANY,**

*By Counsel*

/s/ Laurin H. Mills

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**CERTIFICATE OF SERVICE**

This is to certify that on this 2nd day of October, 2017, the foregoing was sent via ECF to the following counsel of record for Plaintiff:

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